

EXHIBIT A

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ATTN: *Ms. Mosley*
SADB-MS Mosley *ef*

WILLIAM BRANCH
Plaintiff

CIVIL No.1: CV-00-1728

V.

(Judge ~~CONNERS~~)

Mr. RUSSIAN, et., al.
Defendant

attn: ~~James Connors~~

~~Box 983~~

~~Harrisburg Pa 17108~~

REQUEST FOR INTERROGATORIES SET # 1

THIS IS A REQUEST FOR DISCOVERY IN THE FORM OF INTERROGATOR
PER F.R.C.P. RULE 33 THEY ARE REQUIRED TO BE GIVEN UNDER OATH PER
RULE 33(b)(1). ALL ANSWERS ARE TO BE BY RACE, COMPLETER'S AND NONE
COMPLETER'S OF THE SEX OFFENDER'S PROGRAM AND PAROLED & NOT PAROLED
QUESTIONS: APPLY TO THE YEARS OF 1993 TO DATE
PAROLE STATISTICS

1) HOW MANY INMATES IN THE WHOLE STATE ARE SEX OFFENDERS LIST
BY SEPERATE STATE PRISON.

PRISON

WHITE / BLACK

COMPLETER'S

NONE COMPLETER'S

W / B

W / B

RECEIVED
Office of Attorney General
MAR 22 2004
Litigation Section

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QUESTION:

cont. 1)

<u>PRISON</u>	<u>WHITE / BLACK</u>	<u>COMPLETER'S</u>	<u>NONE COMPLETER'S</u>
		<u>W / B</u>	<u>W / B</u>

TOTALS

2)HOW MANY ARE PAROLED AND THOSE NOT PAROLED BY AND BY S.O.P.
COMPLETION.

<u>PRISON</u>	<u>PAROLED</u>	<u>N/PAROLED</u>	<u>COMPLETER'S</u>	<u>N/COMPLETER'S</u>
	<u>W / B</u>	<u>W / B</u>	<u>W / B</u>	<u>W / B</u>

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QUESTION:

cont. 2)

<u>ON</u>	<u>PAROLED</u>	<u>N/PAROLED</u>	<u>COMPLETER'S</u>	<u>N/COMPLETER'S</u>
	<u>W / B</u>	<u>W / B</u>	<u>W / B</u>	<u>W / B</u>

TOTALS

3) HOW MANY SEX OFFENDERS REOFFEND WITH THE SAME CRIME BY RACE
AND BY PAROLED & N/PAROLED & OF THESE HOW MANY COMPLETED S.O.P.

<u>IN</u>	<u>Reoffend</u>	<u>COMPLETED S.O.P.</u>
	<u>BEFFEND W/S/C</u>	<u>W / B</u>
	PAROLED	
	N/PAROLED	

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QUESTION:
cont. 3)

<u>PRISON</u>	<u>REOFFEND. W/S/C</u>	<u>COMPLETED S.O.P.</u>	<u>TOTAL</u>
	W / B	W / B	
	PAROLED		
	N/PAROLED		

TOTAL

4) HOW MANY INMATES WERE DENIED PAROLE BASED UPON MISCONDUCTS
WRITTEN BY DEFENDANTS & A TOTAL OF ALL MISCONDUCTS EACH ONE WROTE
BY YEAR.

<u>PRISON</u>	<u>NAME</u>	<u>No. OF MISCONDUCTS</u>	<u>YEAR</u>	<u>RACE - W/B</u>
		DENIED/P		
		TOTAL /ALL		

QUESTION: USE ATTACHMENT PAGES IF NECESSARY

5. **HOW MANY OF THE DEFENDANTS HAVE BEEN ORDER TO ENTER A DRUG OR ALCOHOLIC PROGRAM, NOW OR IN THE PAST.**
6. **HOW MANY OF THE DEFENDANTS HAVE HAD GRIEVANCES WRITTEN AGAINST THEM AND WHAT WERE THEY ABOUT**
7. **HOW MANY OF THE DEFENDANTS WHO HAVE GRIEVANCES WRITTEN AGAINST THEM HAS THE D.O.C. OR THE UNION OR THE COURTS, FOUND GUILTY AND PUNISHED FOR MISTREATING INMATES OR OTHER STAFF MEMBERS**
8. **HOW MANY OF THE DEFENDANTS HAS THE D.O.C. FOUND GUILTY OF ANY MISCONDUCT; WHAT WAS THE MISCONDUCT, AND WHAT WAS THE PUNISH.**

5(A) Request for interrogatories set #1

THE BASE PAY OF ALL DEFENDANTS FROM 1999 TO DATE (ATTACH ADDISONAL PAGES IF NEEDED)

OVERTIME EARNED BY DEFENDANTS FROM 1999 TO DATE (ATTACH ADDISONAL PAGES IF NEEDED)

TOTAL OF PAY PER YEAR WITH OVERTIME EARNED BY DEFENDANTS

a AVERAGE OVERTIME EARNED BY OTHER STAFF MEMBERS IN SAME JOB DURNING SAME TIME FRAME.

TOTAL PAY PER YEAR WITH OVERTIME EARN BY OTHER STAFF MEMBERS

DID MICKENS-THOMAS COMPLETE SEX-OFFENDERS PROMGRAM, AND WHY WAS THE PAROLE BOARD AGAINST HIS BEING RELEASED ON PAROLE?

PLEASE PROVIDE ME WITH ACCESS TO THE C/O'S GREEN TABLET KEPT AT THE DESK OF BLOCKS M-2, & F-2, ALSO MY QUOTER CARDS FOR EXAMINATION AND COPY F-2 FROM 2000 TO 2004 AND M-2 FROM 1995 TO 2000, AND 2004 JAN. TO DATE
also what type of medication G. Gowat is taking he is.

ON ALL QUESTION PLEASE USE ADDISONAL PAPER IF NEEDED

Supply answers from all named Defendants, did they do what is alleged by me, what did they do when I informed them of an act by another staff member

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QUESTION:

9) ON WHAT DATE WAS THE STATE POLICE INFORMATION ADDED TO MY FILE AT THE D.O.C. AND THE P.B.P.P. ADDING OTHER CHARGES TO MY RECORD OR CONVICTIONS.

DATE

BY WHOM AND WHO REQUEST & REASON

D.O.C.

P.B.P.P.

10) IN PHILA BY RACE HOW MANY PEOPLE ARE ARRESTED FOR SEXUAL OFFENSE'S HOW MANY ARE CHARGED WITH ASEXUAL OFFENSE AND HOW MANY ARE CONVICTED OF A SEXUAL OFFENSE AND HOW MANY SERVE TIME FOR A SEXUAL OFFENSE ?

ARRESTED CHARGED CONVICTED SERVE/TIME

WHITE

BLACK

TOTAL

I AFFIRM UNDER PENELTY OF THE LAW THAT THE ABOVE FACTS ARE TRUE TO THE BEST OF MY KNOWLEDGE

DATE _____

NAME _____

TITLE _____

ADDRESS _____

CITY _____ Pa. _____

PROOF OF SERVICE

I, the undersigned, verify that I have served a copy of this petition by U.S. postage paid mail to:

(WB) 3/18/04 Ms. Mosley sup
 strawberry sq
 Harrisburg Pa.
 17120
 Rambo J. D.O.C. Dr. Beard P.B.P.P.
 17041 Po Box 598 11013 front st
 U.S.D.C.M.D. champhill Pa. suite 5300
 Harrisburg Pa.
 17104-2519
 Attn: John J. Talaber / m.w. + R.N. Sears
 55 utley Drive GOVERNORS office Gen. J. Conner
 camphill Pa-17011 Counsel (WB) Box
 12-24-02
 U.S.D.C.M.D. certified
 Penna mail No.
 7099-3400-009-3162-
 5792

NA
 I, the undersigned, move this Honorable Court for an order
 permitting me to proceed In Forma Pauperis. I had previously been
 granted In Forma Pauperis status. My financial situation has not
 changed. I am still unable to pay the cost of the said
 proceedings.

VERIFICATION

I, the undersigned, verify that the above statements are true and
 correct and that any false statements herein are made subject to
 Title 18 Pa.C.S.A. section 4904 relating to unsworn falsification
 to authorities.

Respectfully submitted,

Dated: ~~5-30-02~~

(WB) 3/18/04
(WB) 9-16-03

William Branch CF 3756

S.C.I. Waymart
 P.O. Box 256
 Waymart, PA 18472-0256